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Southwestern Bell

AUG 27 1992

Federal Communications Commission
Office of the Secretary

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FILE

August 26, 1992

Richard C. Hartgrove
General Attorney

Mr. William A. Blase
Director-Federal Regulatory
Southwestern Bell Corporation
1667 K Street, N.W., Suite 1000
Washington, D.C. 20006

Dear Bill:

Re: Reply of Southwestern Bell Telephone Company,
CC Docket No. 92-77

Enclosed please find an original and five (5) copies of the above-referenced pleading to be filed with the Secretary of the Commission on Thursday, August 27, 1992. Also enclosed is a copy of the pleading to be filed-stamped and returned to me.

Additional copies of the pleading are attached to be used as the courtesy copies and one is included for your files.

Please call to confirm that the pleading has been filed. Thank you for your assistance.

Very truly yours,

Richard C. Hartgrove

Enclosure

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St. Louis, MO 63101

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10-1000000-049
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Federal Communications Commission
Office of the Secretary

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Billed Party Preference) CC Docket No. 92-77
for 0+ InterLATA Calls)
)
)

REPLY OF SOUTHWESTERN BELL TELEPHONE COMPANY

SOUTHWESTERN BELL TELEPHONE COMPANY

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August 27, 1992

REPLY COMMENTS OF
SOUTHWESTERN BELL TELEPHONE COMPANY

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SUMMARY*

Due to the consumer and competitive benefits of BPP, and certain IXC cost reductions possible with BPP such as reduced commission payments, reduced advertising expenses for customer dialing instructions and reduced operating expenses resulting from LEC collection and forwarding of customer billing information, SWBT believes that the costs of BPP still warrant its implementation.

SWBT's cost predictions are based on information provided by vendors. In some cases, these cost estimates continue to be characterized as "planning prices" that SWBT has been told will be subject to change with increased vendor knowledge and understanding of the impacts from requisite BPP functionality.

SWBT estimates that the costs for BPP will translate into an approximate rate of \$.08 - \$.13 per call. This estimate does not assume recovery of certain costs (i.e., end office signalling upgrades) from other services that will potentially benefit from the technology required for implementation of BPP.

It also appears to SWBT that IXCs may not even need to require end user consumers to participate in the direct recovery of BPP costs, because of cost offsets from BPP. However, even if IXCs were to require end user consumers to absorb the costs of BPP, SWBT believes most consumers would not object to paying approximately \$.10 more per call to gain the conveniences and assurances possible with BPP.

SWBT supports NARUC's proposal that the Commission

*All abbreviations used herein are referenced within the text.

institute an FNPRM to address BPP costs and their recovery.

SWBT believes that incorporation of commercial credit cards into a BPP environment should be deferred to a second phase of BPP development.

SWBT expects originating screening functionality to be present in a BPP environment. This should allay the concerns of parties responsible for inmate populations.

Implementation of OSS7 signalling and AABS call processing technologies, coincident with other BPP technology, will cause no increases in access times.

Most commentators agree that, for BPP to be successful, it must be universally available from all phones. Even if it were possible (and SWBT does not believe it is) to install MessagePhone technology on all lines (business, residence and public), the cost of MessagePhone's proposal would exceed \$114B, not including other costs required for BPP implementation.

By implementing BPP with methods that will permit customers to change their designation of IXC(s) at any time, customers will be able to use line-number-based calling cards and designate and change the IXC of their choice -- all with the convenience of one PIN and one card.

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON D.C.

AUG 27 1992

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Billed Party Preference) CC Docket No. 92-77
for O+ InterLATA Calls)

REPLY COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT) submits these Reply Comments in the above-referenced proceeding. By and through this proceeding, the Commission seeks further comment on the costs, benefits and implementation of Billed Party Preference (BPP).

I. INTRODUCTION.

In this proceeding,¹ the Commission solicited comments on the costs, benefits and various implementation aspects of a service concept known as Billed Party Preference. BPP would replace presubscription as the means of providing equal access on O+ and O-interLATA calls. In a BPP environment, the billed party, instead of the customer originating the call, would determine the IXC for call transport.

In the Comment cycle of this proceeding, SWBT made known its views on the many questions posed by the Commission concerning the potential benefits and implementation aspects of BPP.² SWBT continues to support its previous views and will not restate them in this cycle. However, SWBT was not able to provide, with reasonable levels of confidence, the requested cost information.

¹ Notice of Proposed Rulemaking (NPRM), CC Docket No. 92-77, released May 8, 1992.

² Comments of SWBT, CC Docket No. 92-77, filed July 7, 1992 (SWBT).

In these Reply Comments, SWBT will outline its present views on the costs for implementing BPP. SWBT will also address other significant issues raised by some of the over one hundred parties which filed in the Comment cycle of this proceeding.

II. THE COSTS OF IMPLEMENTING BPP.

In its Comments in this proceeding, SWBT declined to predict the costs for implementing BPP--due to the apparently contradictory "softness" and incompleteness of cost information provided to SWBT by its vendors. While not all of these areas of concern have been adequately addressed by SWBT's vendors since Comments were filed, SWBT is now able to predict, with greater confidence levels, the costs of implementing BPP. SWBT wishes to stress, however, that its predictions are based on information provided by its vendors. In some cases, these cost estimates continue to be characterized as "planning prices" that SWBT has been told will be subject to change with increased vendor knowledge and understanding of the impacts from requisite BPP functionality.

A. SWBT's Cost Predictions.

SWBT estimates that the costs for BPP will translate into an approximate rate of \$.08 - \$.13 per call. This range of rates is a result of various sensitivity analyses varying the costs of BPP implementation and IXC participation levels. These rate ranges do not assume recovery of certain costs (i.e., end office signaling upgrades) from other services that will potentially benefit from the technology required for implementation of BPP. These rates

also do not assume that these costs might be recovered from all switched access services in order to reduce incentives for IXC by-pass of BPP functionality. Additionally, these rate ranges do not assume that BPP implementation would be narrowed by market segment or call type. Such Commission action would not lower the implementation costs for BPP but rather would increase the rate to be charged by reducing demand.

Due to the consumer and competitive benefits of BPP, and certain IXC cost reductions possible with BPP such as reduced commission payments, reduced advertising expenses for customer dialing instructions and reduced operating expenses resulting from LEC collection and forwarding of customer billing information, SWBT believes that the costs of BPP still warrant its implementation. This statement is based on SWBT's predictions that the costs for BPP do not appear to be injurious to the IXCs that will participate in the recovery of BPP costs. In fact, the costs appear to be beneficial to competition among the IXCs.

It also appears to SWBT that IXCs may not even need to require end-user consumers to participate in the direct recovery of BPP costs, because of cost offsets from BPP. However, even if IXCs were to require end-user consumers to absorb the costs of BPP, SWBT believes most consumers would not object to paying approximately \$.10 more per call to gain the conveniences and assurances possible with BPP.

B. BPP Cost/Rate Development Assumptions.

- All IXC's which provide alternate billing services will participate in BPP. This assumes a BPP willingness-to-pay level of \$.10-.15 per call and a BPP rate within or less-than this range.

- Access code dialing will decline over time with implementation of BPP. Even after BPP implementation, however, IXC's will continue to promote access code dialing, equal to 5% of total BPP eligible calls, in order to provide certain services/features which may not be possible with BPP intervention.

- IXC BPP demand developed based on SWBT's current local and intraLATA alternately-billed call volumes with an annual growth rate of 4%.

- Vendor costs will be no greater than the projected HIGH-END ESTIMATES shown below.

- Discounts typically negotiated were not assumed for vendor software expenses.

- BPP Primary Preferred Carriers (PPC) will initially be based on each customer's 1+ FG-D or "default" carrier. Customers will be given the opportunity to choose a BPP PPC different than their 1+ carrier.

- PPCs will determine Alternate Preferred carriers (APC) and International Preferred carriers (IPC). Subject to service capability constraints, customers will be given the opportunity to choose an APC or IPC that is different than that chosen by their PPC.

- Bill inserts will be developed and mailed to notify customers of BPP options and of their PPC designations. Customers

will be advised to call the business office if changes are required.

- All feature functionality required for the initial phase of BPP will be generally available by mid-1995. SWBT will begin BPP implementation in mid-1995 and expend half of the costs in 1995. The remaining BPP costs will be incurred in 1996, with implementation complete by mid-1996.

- 5 year rate planning period.

- BPP may displace 50% of existing LIDB validation revenues.

- BPP will displace 95% of existing 0- Transfer revenues.

- BPP will displace switched access revenues gained today on local and intraLATA calls that are dialed on a by-pass basis.

- BPP will produce regain of local and intraLATA operator surcharge and associated MTS revenues due to reduced access code dialing.

C. Direct Investment/Recurring Costs Associated with BPP Implementation.

ESTIMATED SWBT IMPLEMENTATION COSTS³
HIGH-END VIEW OF VENDOR COSTS AND
DECLINING IXC ACCESS CODE DIALING
(\$000)

<u>COST COMPONENT</u>	<u>INITIAL COSTS</u>		<u>RECURRING EXPENSE/YEAR</u>
	<u>CAPITAL</u>	<u>EXPENSE</u>	
1. SCP/LIDB Development to support 4 digit CIC expansion and modified BPP query types		165	

³ These costs, when combined with the assumptions outlined above and levelized annual demand of approximately 684M BPP calls, produce an estimated rate of .0956.

2. SWBT system changes to support loading and maintenance of preferred IXCs in LIDB	85	1,000	3.6
3. Customer solicitation/ bill insert for 0+ PIC choices		6,000	
4. LIDB administrative system BPP audit requirements			23.0
5. End office signaling upgrades	20,000	83,500	
6. OSS signaling upgrades		12,000	
7. OSS BPP feature functionality		18,000	
8. AABS system changes	1,200	2,700	
9. Trunk terminations/ rearrangements	11,200	800	
10. Business office costs to respond to customer inquiries on BPP and IXC choice options		4,200	
11. Operator wages to support projected BPP call volumes			8,961.0 (avg/yr)
PROJECTED TOTAL	32,485	128,365	8,987.6 (avg/yr)

III. SWBT SUPPORTS THE ACTIONS PROPOSED BY NARUC

There appear to be wide variances among the many parties filing Comments in this proceeding concerning the cost estimates and associated assumptions for implementation of BPP. For these reasons, SWBT supports the recent action by National Association of Regulatory Utility Commissioners (NARUC).

On August 7, 1992, NARUC made available to the Commission a "resolution regarding billed party preference" adopted at NARUC's

1992 Summer Meeting. Among other things, the NARUC Resolution calls for "a more complete determination of the costs [for BPP]." The NARUC Resolution also recommends that "the FCC should initiate a Further Notice of Proposed Rulemaking [FNPRM], prior to any action on BPP, that would: (1) consider how the FCC would work with the states to coordinate federal and state policies; (2) consider the specific policy proposals contained in this resolution; and (3) would make specific rules proposals; (4) adequately address the issues of the mechanics of costs of implementation and recovery of costs."⁴

SWBT also believes an FNPRM to address BPP costs and their recovery will serve to expedite the decisions required on BPP implementation. Otherwise, the Commission is faced with the time-consuming and virtually impossible task of reconciling the vast differences in cost information and assumptions provided in the Comment cycle.

SWBT outlined many of the same concerns of NARUC in its Comments in this proceeding.⁵ Only such Commission action will allow a timely and prudent decision to be made on implementation of BPP. The costs of BPP, IXC participation in BPP, and the positions of state and federal commissions concerning BPP cost recovery have major bearing on the decision to implement BPP. SWBT has attempted to incorporate assumptions for each of these areas of major concern into the analyses it has performed on implementation of BPP. SWBT's assumptions, and those of other interested stakeholders, could either be validated or corrected in an FNPRM.

⁴ NARUC letter to FCC, dated August 7, 1992, page 5.

⁵ SWBT, pp. 10-12.

IV. SWBT's RESPONSE TO CERTAIN ISSUES RAISED IN COMMENT CYCLE.

A. Commercial Credit Cards and Foreign-Issued Billing Information.

The Commission has sought comment⁶ on how commercial credit cards and foreign-issued billing information would be handled in a BPP environment. Both ends of the spectrum were represented in the Comments on these issues. SWBT is not opposed to use of commercial credit cards in a BPP environment. However, SWBT continues to believe that the development and implementation intervals required to provide BPP functionality for processing of these billing types would delay consumer availability of BPP. For this reason, SWBT believes that incorporation of these billing types should be deferred to a second phase of BPP development.

Contrary to the assertions of VISA and MasterCard, the complexities of processing these billing types are greater than those of 891 calling cards.⁷ While it is true that both types of cards are ISO/ANSI formatted, the processing of both cards is not "virtually identical."⁸ Several differences exist which create unique requirements for these types of billing information in a BPP environment:

1. Because the first six digits of commercial credit card accounts "overlap" or "conflict" with the first six digits of other billing mechanisms, it will be necessary for customers to dial a

⁶ NPRM, pp. 11-14.

⁷ VISA/MasterCard, p. 19.

⁸ Id.

prelimiter or delimiter code, along with their commercial credit card account, so that networks can distinguish between types of billing information being used. This is necessary to accomplish the required processing differences; i.e., query a commercial credit card database, or query an IXC database.

2. Most networks can today accept 891 cards but cannot accept commercial credit cards. This underscores that there are different processing requirements for these two types of cards. Also, OSS vendors are generally more familiar with LEC and IXC card processing requirements than those which would be necessary for processing of commercial credit cards, making more difficult the development of BPP processing requirements for commercial credit cards.

3. To SWBT's knowledge, commercial credit card databases are not presently designed to store carrier choice decisions of commercial credit card holders. Nor are these databases designed to support the types of queries that will be used in a BPP environment. All of these requirements must be defined, developed, tested and implemented. Because of unique and unfamiliar commercial credit card processing requirements, SWBT anticipates that incorporation of these billing types into BPP will cause delay.

4. VISA/MasterCard claim that "13 million have enrolled in the Universal Card program [of AT&T], thereby gaining the ability to bill their long distance calls to their commercial credit card accounts."⁹ This implies that the networks used by these customers can accept billing to a commercial credit card. In reality, these

⁹ Id., p. 15.

customers charge their calls to an AT&T CIID card account that is, in turn, billed and collected by a commercial credit card company.

B. Inmate Calling.

Many parties responsible for inmate populations filed comments expressing concerns about increased fraud with implementation of BPP. These concerns appear to arise from an apparent misunderstanding about discontinuation of present inmate billing restrictions in a BPP environment. Today, most inmates can only place calls on a 0+, collect basis. This is accomplished by what is generally referred to as originating class of call screening. These screening restrictions are, in part, designed to deter fraudulent calling.

Those responsible for inmate populations appear to believe that originating class of call screening will disappear with BPP, thus increasing exposure to fraud. SWBT does not expect, nor will SWBT accept, the discontinuation of originating billing screening restrictions in a BPP environment. Originating screening is today provided, in part, by end-office technology. In a BPP environment, it may be better to relocate this application to the BPP database, but SWBT fully expects originating screening functionality to be present in a BPP environment. This information should allay the concerns of these parties.

C. Increased Access Times.

Certain commentators expressed concerns, and in some cases provided misleading data, about alleged increases in access times

with BPP. SWBT's information--no increase--agrees with Ameritech.¹⁰ Implementation of OSS7 signaling and AABS call processing technologies, coincident with other BPP technology, will cause no increases in access times.

D. Compensation to Premise Owners and Private Payphone Providers.

Many commentators presently enjoying competitive commission payments were apparently encouraged to express concerns about erosion of their existing revenues with implementation of BPP. These concerns arise because, in today's environment of premises owner presubscription, IXCs are often chosen based on the amount of commissions paid to the premises owners rather than on the quality of the IXCs' services or their rates.

SWBT submits that commission payments need not disappear with BPP, but can be reduced with such implementation. The mechanism which the Commission has recently ordered, and is further considering, for compensating competitive payphone providers could also be applied in a BPP environment. This would reduce commission payments and eliminate the results from today's practice of competitive bidding.

The Commission has previously expressed its goal of enacting rules for the OSP industry that will "foster a marketplace environment in which OSPs compete based on the merits of their

¹⁰ Ameritech, p. 15.

services, rather than on the commission payments which OSPs provide to traffic aggregators who deliver a captive clientele."¹¹

BPP accomplishes this goal in the most customer convenient manner possible. The Commission, thus, must choose between meeting its stated goal or protecting the interests of those who enjoy the benefits of competitive commission payments. SWBT believes the public interest is best served by implementation of BPP.

E. Alternative Technologies.

The Commission has sought comment on "whether some or all of the benefits of BPP might be obtainable through alternative, less costly technologies."¹² Only one commentor, MessagePhone, suggested to the Commission the availability of alternative BPP technology.

MessagePhone claims that it has available technology "to provide such 'user-friendly' service [i.e., BPP] today."¹³ MessagePhone further claims that implementation of its proposal "can begin almost immediately after the Commission mandates BPP and could be completed in calendar year 1993."¹⁴ SWBT disagrees with the claims by MessagePhone. The Commission should reject MessagePhone's proposal. MessagePhone's alternative technology "resides on the 'line-side' of the CO switch"¹⁵ and is "capable of providing BPP for

¹¹ *Notice of Proposed Rulemaking*, CC Docket No. 90-313 (released July 17, 1990), p. 7.

¹² NPRM, p. 11.

¹³ MessagePhone, p. 4.

¹⁴ *Id.*, p. 17.

¹⁵ *Id.*, p. 16.

all public and private pay telephones."¹⁶ Additionally, the technology proposed by MessagePhone, like the OSS BPP technology proposed by the Commission and all other commentors, is reliant on queries to "LIDB or some other data base to determine the called [sic] party's presubscribed carrier."¹⁷

MessagePhone's proposal is deficient in several regards:

1. Assuming that MessagePhone's claims are accurate about the functionality of its "line-side technology," MessagePhone's proposal represents only a partial solution targeted for public and private pay telephones at an expense of "\$135 million for [only] 150,000 pay telephones."¹⁸ MessagePhone's proposal therefore, does not affect residence and business telephones, such as those in hotels and other public locations.

Most commentors agree that, for BPP to be successful, it must be universally available from all phones. Even if it were possible (and SWBT does not believe it is) to install MessagePhone's technology on all lines (business, residence and public), the cost of MessagePhone's proposal would exceed \$114B, not including other costs required for BPP implementation.¹⁹

2. MessagePhone's assertions about complete implementation in 1993 fail to recognize that LIDB databases will need to be modified to support BPP. These databases also do not today contain the

¹⁶ Id., p. 2.

¹⁷ Id., p. 16.

¹⁸ Id., p. 25.

¹⁹ This estimate is derived from MessagePhone's claim of \$135 million for 150,000 pay telephones.

requisite carrier choice information. The time required to complete the required modifications and populate the databases with carrier choice information will not allow complete implementation in 1993 as MessagePhone claims.

3. MessagePhone's proposal also does not address the signaling requirements for passing call information to IXC's. Thus, SWBT cannot determine if there is an acceptable signaling interface between MessagePhone's technology and the IXC's.

F. 14-Digit Carrier Identification Screening in LIDB.

Both MCI and US Sprint request the Commission to require LECs to modify their systems to support LEC- and IXC-specific PINs in LIDB. SWBT agrees with the Comments of Ameritech²⁰ on the high cost, billing difficulties and administrative burdens of this request, which the Commission should reject.

SWBT does agree, however, with the apparent objective of both MCI and US Sprint to permit customers to receive the services of the IXC of their choice when using a LEC calling card to place interLATA calls, as well as when placing collect and third number billing calls. This can be accomplished in a less costly and difficult manner.

It is generally accepted in defining BPP that customers will be able to designate an IXC(s) for their interLATA calls when using LEC billing information (i.e., calling card, collect and third number). By implementing BPP with methods that will permit customers to change their designation(s) at any time, customers will be able

²⁰ Ameritech, pp. 12-13.

to use line-number-based calling cards and designate and change the IXC of their choice--all with the convenience of one PIN and one card.

SWBT's customer research shows that customers want more convenience and less confusion. One PIN and one card with IXC change options accomplishes the desires of consumers without imposing additional and counter-productive costs.

V. SUMMARY.

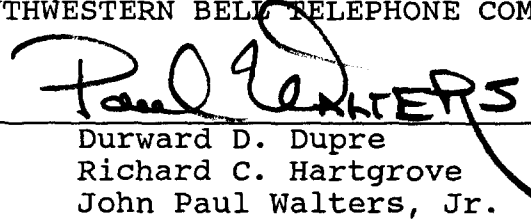
The Commission should do as requested by NARUC and initiate a timely and expedited FNPRM to address the costs of BPP and their recovery. The Commission must also decide if it intends to maintain its goal of enacting rules for the OSP industry that will "foster a marketplace environment in which OSPs compete based on the merits of their services, rather than on the commission payments which OSPs provide to traffic aggregators who deliver a captive clientele." If

so, BPP is the required direction. Only after the above two actions are taken, however, can the decision be made to implement BPP, which SWBT continues to believe is in the best interest of consumers and competition.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By


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August 27, 1992

CERTIFICATE OF SERVICE

I, Athena Nance, hereby certify that the foregoing
"Reply of Southwestern Bell Telephone Company" in
Docket No. CC-92-77, has been served this 27th day of
August, 1992 to the Parties of Record.



ATHENA NANCE

August 27, 1992

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